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Attorneys for Plaintiff  
FADUA GALDAMEZ

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

FADUA GALDAMEZ, an individual,

Plaintiff,

vs.

ST. FRANCIS HOTEL CORPORATION,  
dba THE WESTIN ST. FRANCIS  
HOTEL, and DOES 1-10, inclusive,

Defendants.

Case No. 3:15-cv-01042-JST

**JOINT STIPULATION TO CONTINUE  
DEADLINE TO COMPLETE ADR;  
[PROPOSED] ORDER**

**Complaint Filed:** February 5, 2015

TO THE COURT:

Plaintiff FADUA GALDAMEZ (“Plaintiff”) and Defendant ST. FRANCIS HOTEL  
CORPORATION (“Defendant”) (collectively “the parties”), by and through their respective

counsel of record, herein agree and stipulate as follows:

### **RECITALS**

1. On May 21, 2015, the parties agreed to participate in court-sponsored Alternative Dispute Resolution, specifically mediation. (ECF Document 11).

2. The current deadline to complete mediation is August 19, 2015. (ECF Document 11).

3. Due to family health circumstances, Defendant's lead counsel must travel to the East Coast for the first few weeks of August and, therefore, is not able to complete mediation by the current deadline of August 19, 2015.

4. The assigned mediator and the parties' counsel are in agreement to extend the deadline to complete mediation in view of the above circumstances.

5. The parties expect to complete mediation within the first ten days of September 2015 and thus request a thirty-day extension.

6. There have been no earlier extensions to complete the Alternative Dispute Resolution process. This is the parties' first request for an extension.

### **STIPULATION**

NOW, THEREFORE, Plaintiff and Defendant hereby agrees and stipulates as follows, subject to Court approval, that the deadline for the parties to complete the Alternative Dispute Resolution process presently set for August 19, 2015 be continued to **September 18, 2015**.

IT IS SO STIPULATED:

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1 Dated: July 20, 2015

HIRSCHFELD KRAEMER LLP

2  
3 By: /s/ Kristin L. Oliveira

4 John F. Baum  
Kristin L. Oliveira  
Erin E. Dolly

5 Attorneys for Defendant  
6 ST. FRANCIS HOTEL CORPORATION

7 Dated: July 20, 2015

MCCORMAC & ASSOCIATES

8  
9 By: /s/ Valerie R. Perdue as authorized on 7/20/15

10 Kathleen A. McCormac  
Valerie R. Perdue

11 Attorneys for Plaintiff  
FADUA GALDAMEZ

12  
13 **~~PROPOSED~~ ORDER**

14 Pursuant to the parties' Joint Stipulation, it is so ordered that the deadline to complete the  
15 Alternative Dispute Resolution process is now **September 18, 2015**.

16  
17 Dated: July 22, 2015

18 By: \_\_\_\_\_

